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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR 16-0115 WHA
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
v.)	EXCLUDING TIME FROM SEPTEMBER
)	20, 2016, TO OCTOBER 11, 2016
ROBERT COLE FUHRMAN,)	
)	
Defendant.)	
)	

The United States of America, by and through Assistant United States Attorney Brian R. Faerstein, and defendant Robert Cole Fuhrman, by and through defense counsel Geoffrey Hansen, hereby stipulate that, with the Court's approval, the time between September 20, 2016 and October 11, 2016 is excludable under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), for effective preparation of counsel.

The parties appeared before this Court on September 20, 2016, at 2:00 p.m., for a status conference in this proceeding. Upon the request of the parties, the Court set a further status hearing for October 11, 2016, at 2:00 p.m., when it is anticipated that the defendant will be entering a change of plea

1 in this proceeding. Upon the representation of counsel for the defendant that he needed additional time
 2 to review discovery and conduct necessary investigation in connection with the defendant's entering a
 3 change of plea, the defendant requested that time be excluded under the Speedy Trial Act between
 4 September 20, 2016 and October 11, 2016, for effective preparation of counsel, under 18 U.S.C.
 5 § 3161(h)(7)(B)(iv). The government did not have any objection to this request.

6 The parties stipulate that the failure to exclude time would deny counsel the reasonable time
 7 necessary for effective preparation, taking into account the exercise of due diligence under 18 U.S.C.
 8 § 3161(h)(7)(B)(iv). The parties further stipulate that the requested exclusion of time, from September
 9 20, 2016 to October 11, 2016, is in the interests of justice and outweighs the best interest of the public
 10 and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

11 IT IS SO STIPULATED.

12 Dated: September 21, 2016

BRIAN J. STRETCH

United States Attorney

_____/s/_____
 14

15 BRIAN R. FAERSTEIN

Assistant United States Attorney

17 Dated: September 21, 2016

_____/s/_____
 18

GEOFFREY HANSEN

Attorney for ROBERT COLE FUHRMAN

20 Attestation of Filer

21 In addition to myself, the other signatory to this document is Geoffrey Hansen. I hereby attest
 22 that I have his permission to enter a conformed signature on his behalf and to file this document.

23 Dated: September 21, 2016

_____/s/_____
 24

BRIAN R. FAERSTEIN


Assistant United States Attorney

~~PROPOSED~~ ORDER

Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time between September 20, 2016 and October 11, 2016, would unreasonably deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between September 20, 2016 and October 11, 2016, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, IT IS HEREBY ORDERED that the time between September 20, 2016 and October 11, 2016, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: September 21, 2016.


HONORABLE WILLIAM ALSUP
United States District Judge